

EXHIBIT AA

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

THE STATE OF TEXAS, et)
al.,)
) Case No.
Plaintiffs,) 4:20-cv-00957-SDJ
)
vs.) Hon. Sean D. Jordan
)
GOOGLE LLC,)
)
Defendant.)

FRIDAY, MAY 24, 2024

HIGHLY CONFIDENTIAL - PURSUANT TO PROTECTIVE
ORDER

- - -

Videotaped deposition of Neal
Mohan, in his personal capacity and 30(b)(6)
designee of Google LLC, held at the offices
of Freshfields Bruckhaus Deringer, 855 Main
Street, Redwood City, California, commencing
at 9:35 a.m. Pacific Time, on the above date,
before Carrie A. Campbell, Registered
Diplomate Reporter, Certified Realtime
Reporter, Illinois, California & Texas
Certified Shorthand Reporter, Missouri,
Kansas, Louisiana & New Jersey Certified
Court Reporter.

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Job No. MDLG6687875

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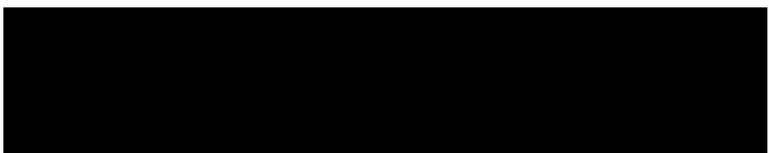
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1 A. Next page.

2 Q. "The market for online display
3 ads was a multi-billion dollar opportunity
4 for Google, and its success in developing
5 advertising technology was a primary way it
6 became one of the world's most valuable
7 companies. Acquisitions were key to this
8 transformation."

9 Do you see that sentence?

10 A. I see that, yes.

11 Q. And we've talked about a host
12 of acquisitions that took place before that.
13 Right?

14 A. Yes, in our previous
15 conversation we talked about some of those.

16 Q. "Google purchased the
17 advertising exchange DoubleClick for
18 3.1 billion in 2007, and the mobile
19 advertising company AdMob for 750 million in
20 2009."

21 Do you see that?

22 A. I see that sentence.

23 Q. Again, you and I talked about
24 the purchase of DoubleClick in 2007 for 3.1?

25 A. Yeah.

1 This article mischaracterizes
2 it, though, as you can see.

3 Q. Well, you don't like it calling
4 it an advertising exchange.

5 Right?

6 A. Yeah, I don't think that would
7 be -- an accurate representation of what
8 DoubleClick is.

9 Q. We'll let folks who want to
10 fuss about that fuss about that. That's not
11 my issue right now.

12 My issue is, that's the one we
13 talked about, the purchase of 2, 3.1 billion
14 and the purchase of 750 million in 2009.

15 Correct?

16 A. I see these amounts, yes, in
17 the article.

18 Q. "Both deals prompted antitrust
19 reviews, with accompanying costs."

20 And you know about that with at
21 least DoubleClick.

22 Right?

23 A. I do know that -- about that
24 with DoubleClick. I don't know if that's
25 accurate in the case of AdMob.

1 Q. And the reason you know it for
2 DoubleClick is why you and I have had some
3 questions and answers where I talk about the
4 purchase being 2007, and you saying the deal
5 didn't close until 2008 because it took that
6 long to get approval.

7 Right?

8 MS. SESSIONS: Object to the
9 form.

10 THE WITNESS: The deal closed
11 in 2008, correct.

12 QUESTIONS BY MR. LANIER:

13 Q. "In retrospect, Invite had been
14 serving as an important independent piece of
15 the advertising market. As a startup, it had
16 created a software tool, called a demand-side
17 platform, to make it simpler for marketers to
18 buy ads online."

19 Do you see that?

20 A. Yes, I see that.

21 Q. And the way you had termed it,
22 you said it was an advertising technology for
23 acquiring inventory for ads to run in a
24 programmatic fashion. That was your
25 description.

1 Right?

2 A. Yeah.

3 MS. SESSIONS: Object to the
4 form.

5 THE WITNESS: Broadly. I
6 think, you know, we had a few other
7 terms in there, but that was a summary
8 of some of what I talked about.

9 QUESTIONS BY MR. LANIER:

10 Q. "The service allowed them to
11 shop for advertising space on multiple
12 platforms at once."

13 It gave choice.

14 MS. SESSIONS: Object to the
15 form.

16 QUESTIONS BY MR. LANIER:

17 Q. Right?

18 MS. SESSIONS: Object to the
19 form.

20 THE WITNESS: What do you mean
21 by that?

22 QUESTIONS BY MR. LANIER:

23 Q. I mean it allowed them to shop
24 for advertising space on multiple platforms
25 at once.

CERTIFICATE

I, CARRIE A. CAMPBELL, Registered Diplomat Reporter, Certified Realtime Reporter and Certified Shorthand Reporter, do hereby certify that prior to the commencement of the examination, Neal Mohan, was duly sworn by me to testify to the truth, the whole truth and nothing but the truth.

I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by and before me at the time, place and on the date hereinbefore set forth, to the best of my ability.

I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the action.



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